

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Semaj Antonio Ayers

Case No. 22-30487

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 3, 2022 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

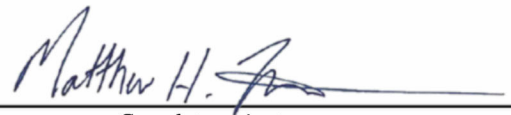
*Code Section**Offense Description*

18 U.S.C. § 922(g)(1)

Felon in Possession of a Firearm

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.Sworn to before me and signed in my presence
and/or by reliable electronic means.Date: November 7, 2022City and state: Detroit, MI*Complainant's signature*Matthew Totten, Special Agent, ATF*Printed name and title**Judge's signature*Hon. Kimberly G. Altman, United States Magistrate Judge*Printed name and title*

AFFIDAVIT

I, Special Agent Matthew Totten, being duly sworn, do hereby state:

I. INTRODUCTION

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives, and have been since March of 2020. I am an “investigative or law enforcement officer of the United States” within the meaning of Title 18, United States Code, Section 2510(7), and I am empowered by law to conduct investigations and make arrests of offenses enumerated under federal law.

2. As a Special Agent, I am currently assigned to Group IV in the Detroit Field Division. I have conducted and participated in numerous criminal investigations focused on firearms and narcotics violations. I am a graduate of the Criminal Investigator Training Program and the ATF Special Agent Basic Training Program at the Federal Law Enforcement Training Center in Glynco, Georgia. Prior to my employment with ATF, I was employed as a State Trooper with the Michigan State Police for six years from 2014 through 2020.

3. As an ATF Special Agent, I have participated in numerous criminal investigations, including investigations involving firearms, armed drug tracking, and criminal street gangs. I am familiar with, and have experience using, a variety of investigative techniques and resources, including physical and electronic surveillance, undercover and various types of informants, and cooperating sources.

4. I make this affidavit from personal knowledge based on my participation in this investigation, my review of written police reports and other documents, and information provided to me by and/or through other law enforcement agents, investigators, and individuals with knowledge of this matter.

5. The information contained in this affidavit is provided for the limited purpose of establishing probable cause, and does set forth each and every fact known to law enforcement regarding this investigation.

II. PROBABLE CAUSE

6. ATF is currently investigating Semaj Antonio AYERS (DOB: XX/XX/2002) for violating 18 U.S.C. § 922(g)(1) (Felon in Possession of a Firearm).

7. I reviewed a computer printout of AYERS' criminal history (CCH), which indicated that AYERS pled guilty to the felony offense of weapons – carrying concealed in 2021 and was sentenced in 2022 in the 3rd Circuit Court in Wayne County.

8. AYERS knows that he has been convicted of a crime punishable by more than one year in prison. In fact, on April 11, 2022, AYERS was sentenced to 8 months in prison and 2 years of probation. AYERS is still currently on probation.

9. On November 1, 2022, I obtained a federal search warrant (22-mc-XXXXX-24) from the Honorable Elizabeth A. Stafford to search 124XX Pine St.

in Taylor, MI for an electronic device belonging to Semaj AYERS and to arrest AYERS on his federal arrest warrant (22-XXXXXX-24) for 18 U.S.C 1201(a)(1) and (c) – Kidnapping Conspiracy, 18 U.S.C. 1201(a)(1);2 – Kidnapping, Aiding and Abetting. Additionally, AYERS had an arrest warrant (22-CR-20519) for 18 U.S.C 1343 – Wire Fraud, 18 U.S.C 1028 (a) – Aggravated Identity Theft and 18 U.S.C 1341 – Mail Fraud. ATF agents and law enforcement executed the search warrant the morning of November 3, 2022.

10. AYERS bedroom had personal possessions with his name on paperwork, his clothes and photos of himself in the room. AYERS’ mother who was present during the execution of the warrant stated that AYERS’ stays in the upstairs bedroom which is the bedroom where the firearm was recovered.

11. While searching a closet in AYERS’ bedroom, agents recovered a Glock 26, 9mm semi-automatic pistol bearing serial number: AFXV857 with an extended magazine which was loaded with one round in the chamber. The firearm was stolen out of Highland Park, MI.

12. On November 4, 2022, I personally spoke with ATF Special Agent Mike Jacobs, an expert in the Interstate Nexus expert of firearms. Based on the description of the firearm provided, and without examining the firearm, Special Agent Jacobs stated that the firearm was manufactured outside the State of Michigan, and therefore had traveled in or affected interstate commerce.

13. AYERS was later interviewed by ATF Agents in a custodial interview. AYERS waived his miranda rights and agreed to speak with Agents. During the interview AYERS stated that he was not allowed to possess firearms or be around firearms.

III. CONCLUSION

14. Based on the above information, probable cause exists that Semaj AYERS, knowing that he had previously been convicted of a crime punishable by a term exceeding one year, did knowingly and intentionally possess a firearm, which had traveled in or affected interstate commerce, in violation of 18 U.S.C. § 922(g)(1).



Matthew Totten
Special Agent, Bureau of Alcohol,
Tobacco, Firearms, and Explosives

Sworn to before me and signed in my
presence and/or by reliable electronic means.



HON. KIMBERLY G. ALTMAN
UNITED STATES MAGISTRATE JUDGE

DATED: November 7, 2022